

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

*In re:*

SUREFUNDING, LLC,

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

**Obj. Deadline: Nov. 8, 2024 @ 4:00 p.m.**

**MOTION TO WITHDRAW AS COUNSEL**

Klein LLC and Julia Bettina Klein (together, the “Firm”) hereby move to withdraw as counsel for CTJT Family Trust, HARRAY Holdings Trust, SCTOT, LLC, SureClick, LLC, Marketplace Capital Strategies, LLC, MCS US, LLC, Justin and Lorna Abernathy, the Justin Abernathy 2015 GRAT, Marketplace Advisors, LLC, Justin Abernathy, and Jason Abernathy (collectively, the “Abernathys”) stating as follows:

1. The Firm previously was retained to represent and entered its appearance on behalf of the Abernathys in the captioned matter.
2. The Firm’s retention of the Abernathys has terminated.
3. The Firm seeks the entry of an order granting leave to withdraw as counsel of record in the captioned matter pursuant to Bankr. L.R. 9010-2(b) and Rules 1.16(a)(3), (b)(1), (3), (4), (5), (6), (7) and 1.16(c) of The Delaware Lawyers’ Rules of Professional Conduct.
4. The Firm has conferred with the Abernathys, who do not oppose the relief requested herein.

**NOTICE**

5. Notice hereof has been given to the Abernathys via electronic mail and all other Rule 2002 parties registered to receive CM/ECF notices in this case.

**CONCLUSION**

For the foregoing reasons the Firm asks that the Court enter an order, substantially in the form filed herewith, granting the request sought herein and such further relief as is just and proper.

Dated: October 25, 2024  
Wilmington, Delaware

**KLEIN LLC**

/s/ Julia Klein  
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*Withdrawing Counsel for the Abernathys*